Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Local Exchange Carrier Line Information Data Base	)	CC Docket No. 92-24

DIRECT CASE OF BELL ATLANTIC[1]

Bell Atlantic hereby provides its Direct Case in response to the first two issues identified in the Bureau's March 20, 1992 Order Designating Issues for Investigation.[2] The following are the first two questions asked in the *Designation Order*, and Bell Atlantic's answers.

I. Have the LECs adequately described the LIDB query service in the tariffs?

The Bureau asks, in particular, about the nature and frequency of database updates, and what liability the LECs should have for erroneous data entries. Bell Atlantic updates its LIDB once each business day for routine changes, such as reconnects, disconnects, and change orders, that are generated by service orders placed through Bell Atlantic's Business Offices. These changes are made on a largely automated basis the evening of

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[1] The Bell Atlantic telephone companies ("Bell Atlantic") are The Bell Telephone Company of Pennsylvania, The Diamond State Telephone Company, the four Chesapeake and Potomac telephone companies, and New Jersey Bell Telephone Company.

[2] *Local Exchange Carrier Line Information Data Base*, CC Docket No. 92-24, DA 92-347 (released Mar. 20, 1992) ("*Designation Order*"). *See also Local Exchange Carrier Line Information Data Base*, 7 FCC Rcd 525 (1991). On April 20, 1992, the Bureau granted Bell Atlantic an additional two weeks in which to respond to the cost issues specified in item III of the *Designation Order*. *See* DA 92-495.

every working day. Urgent update requests, such as reports that cards have been lost or stolen, are handled independently and immediately, by the Business Office or by Bell Atlantic's Lost and Stolen Card Center in Philadelphia. Bell Atlantic already has contact points that are open seven days a week and twenty-four hours per day in several Bell Atlantic service areas, and is actively working to expand this capability so that it is available throughout the region.

Pursuant to its tariff, Bell Atlantic accepts no liability to carriers for erroneous information in LIDB.[3] Bell Atlantic, however, uses the database to validate calls made over its own network, and therefore risks the loss of its own revenues if its validation information is inaccurate. Accordingly, Bell Atlantic has a strong economic incentive to ensure that the database is accurate.

The Bureau also asks whether LECs should be liable for the fraudulent use of calling cards as part of their regulated LIDB service. Bell Atlantic strongly opposes this suggestion. First, Bell Atlantic has no means of knowing whether a given LIDB query was fraudulent. All that Bell Atlantic knows at the time of a validation request -- and all that a validation from LIDB signifies -- is that the billing number reported by the customer

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[3] *See* Tariff FCC No. 1, Section 2.1.3.

is a valid billing account number, and that the PIN and billing account number match.

Second, Bell Atlantic's rates for LIDB do not include a premium to compensate it for insuring the carriers' revenues and bearing the substantial risks that would be associated with such assumption of liability. Third, because Bell Atlantic uses its LIDB for its own calls, it already has a strong incentive to prevent fraud in its own right. It does this by building automatic processes into LIDB that will disable an account number if usage patterns meet certain criteria characteristic of fraud, and by providing the means for carriers to request that an account number be taken down if they have a reason to suspect fraud. Finally, requiring that Bell Atlantic bear the risk of fraudulent calling card practices would discourage other carriers from taking all possible steps to protect their own networks against fraud. This would be bad public policy.[4]

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[4] Responsibility for losses attributable to fraud should be allocated between the LECs operating LIDBs and the carriers, if at all, only in billing and collections agreements. In these agreements, the parties can take into account the fraud experiences of different carriers. For example, some carriers have more aggressive and effective fraud prevention programs than others, which can be taken into account in the individualized negotiation of billing and collections agreements. These agreements can also ensure that the LEC is compensated appropriately for the degree of risk it takes in its dealings with each carrier. A generally applicable tariff, by contrast, does not reasonably accommodate individual differences in loss characteristics. In fact, a general tariff creates an incentive for carriers to weaken their own fraud prevention efforts in the comfort of knowing that the LECs -- or other ratepayers -- will make up their losses.

The Bureau requests a description of Bell Atlantic's "call gapping" procedures. Call gapping protects the LIDB from overload conditions. At low levels of overload, the LIDB electronically instructs its users to control their queries and only send queries at predetermined intervals. At higher levels of overload, the LIDB automatically discards a predetermined percentage of the queries being sent to it. Call gapping is applied to all queries sent to the LIDB -- whether by Bell Atlantic or by other carriers -- on an equal basis. Attachment A provides additional information about call gapping.

The Bureau asks whether the dates of revisions to Technical Publications should be reflected in the tariff. Bell Atlantic agrees that this information should be included. Bell Atlantic updates its tariff periodically to incorporate new technical publication information. Additionally, upon request Bellcore will arrange to automatically send customers updates of technical publications as they are issued.

II. Should the tariffs contain additional detail regarding the technical parameters for the CCS interconnection link?

The tariffs already contain technical references to extensive information about CCS interconnection, totalling

several hundred pages in length.[5] Bell Atlantic knows of no technical parameters or other operating information needed by interconnecting customers that are not provided in these technical references. Inclusion of this complex and detailed technical information in the tariff would not be advisable -- it would likely double or triple the length of LEC access tariffs, and would necessitate frequent tariff modifications in order to update the information.

Respectfully submitted,

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April 21, 1992

[5] The technical references relevant to LIDB and its associated CCS-7 interconnection are TR-TSV-000905, Common Channel Signaling Network Interface Specification, Issue 1, August 1989; Bell Atlantic Regional Supplement to TR-TSV-000905, Issue 1, December 1990; and TR-TSV-000954, CCS Network Interface Specification Supporting Alternate Billing Services, Issue 1, November 1989.

ATTACHMENT A

CALL GAPPING

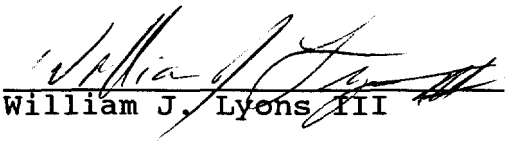
Call gapping is a LIDB feature that provides network management in overload conditions. There are six levels of overload in LIDB. Level 1 and 2 overloads represent mild overload conditions. The LIDB system prioritizes activities to ensure that LIDB queries can be processed, and at these levels customer queries are unaffected. Level 3 overload conditions are more serious, and cause Automatic Call Gap Messages (ACG) to be generated and the processing of LIDB queries is affected. Level 3 overloads are subdivided into eight sublevels of increasing overload severity, from 3.1 to 3.8. The LIDB contains a table which automatically assigns an *Interval Index* and a *Control Duration Index* for each overload sublevel. Interval Indices can range from 0 to 15 and Duration Control Indices can range from 1 to 13.

When a Level 3 overload condition is detected by the LIDB, all responses from the LIDB to customers have an ACG message appended to them. This message indicates the overload cause and the assigned Interval Index and a Duration Control Index. The Interval Index, also called the "gap," specifies the minimum amount of time that the customer must wait between queries. The customer's equipment includes a table which translates these indices. For example, an Interval Index value of 0 may signify that the customer must wait 2 seconds between queries. The Duration Control Index advises the customer as to how long the restriction is to remain in effect. For example, a Duration Control Index of 5 might indicate that the restriction is to remain in effect for 16 seconds. Upon receipt of such a message, the customer's equipment would automatically release queries at intervals of at least 2 seconds for the next sixteen seconds. The customer's equipment would return to normal operations at the end of the 16 second period, unless a subsequent ACG specified a continuation of call gapping procedures. These ACG messages are sent on an equal basis to all customers using the LIDB, including Bell Atlantic.

If overload conditions continue despite the imposition of Level 3 overload protection, the LIDB has three additional levels of overload protection -- Levels 4, 5 and 6. At these overload levels, the LIDB system begins to discard LIDB queries as they are received. At Level 4, 33% of the queries are discarded. At Level 5, 66% of the queries are discarded. Finally, at Level 6, 100% of the queries are discarded. At all three of these overload levels, queries are discarded from all customers, including Bell Atlantic, on an equal basis.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Direct Case of Bell Atlantic" was served this 21st day of April, 1992, by delivery thereof by first class mail, postage prepaid, to the parties on the attached list.



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